

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)**

In re:

CIRCUIT CITY STORES, INC., ET AL.,

Debtors

Chapter 11

Case No. 08-35653 (KRH)

Jointly Administered

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE THAT CC Hamburg NY Partners, LLC, as successor in interest to Hamburg Peripheral Limited Partnership ("CC Hamburg"), by and through its counsel, has filed with the Court a Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 365(d)(3), 503(b) and 507(a)(2) Granting Allowance and Compelling Payment of Administrative Claim, a copy of which has been forwarded to you.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult one). Under Local Bankruptcy Rule 4001-(a), the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing unless you take the following steps.

1. File with the Court, at the address shown below, a written objection. If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before **May 25, 2009 at 5:00 p.m.**

William C. Redden, Clerk
United States Bankruptcy Court
701 E. Broad Street, Suite 4000
Richmond, VA 23219

You must also deliver a copy to all parties on the Certificate of Service below and to:

Douglas M. Foley, Esq.
McGuire Woods, LLP
One James Center
901 East Cary St.
Richmond, VA 23219

Counsel for the Debtors

Greg M. Galardi, Esq.
Ian S. Fredericks, Esq.
Skadden, Arps, Slate, Meagher & Flom, LLP
One Rodney Square
P.O. Box 636
Wilmington, Delaware 19899-0636

Counsel for the Debtors

<p>Dion W. Hayes, Esq. Joseph S. Sheerin, Esq. Sarah Becket Boehm, Esq. McGuire Woods LLP One James Center 901 East Cary Street Richmond, Virginia 23219</p> <p><i>Counsel for the Debtors</i></p>	<p>Chris L. Dickerson, Esq. Skadden, Arps, Slate, Meagher & Flom, LLP 333 West Wacker Dr. Chicago, IL 60606</p> <p><i>Counsel for the Debtors</i></p>
<p>Lynn L. Tavenner, Esq. Paula S. Beran, Esq. Tavenner & Beran, P.C. 20 North Eights Street, 2nd Floor Richmond, Virginia 23219</p> <p><i>Counsel for the Official Committee of Unsecured Creditors</i></p>	<p>Jeffrey N. Poemrantz, Esq. Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Boulevard, 11th Floor Los Angeles, California 90067-4100</p> <p><i>Counsel for the Official Committee of Unsecured Creditors</i></p>
<p>Robert J. Feinstein, Esq. Pachulski Stang Ziehl & Jones LLP 780 Third Avenue, 36th Floor New York, New York 10017-2024</p> <p><i>Counsel for the Official Committee of Unsecured Creditors</i></p>	<p>Robert B. Van Arsdale, Esq. Office of the U.S. Trustee 701 E. Broad Street, Suite 4304 Richmond, Virginia</p>

2. Attend the hearing scheduled for **May 28, 2009 at 10:00 a.m.** before the Honorable Kevin Huennkens, U.S. Bankruptcy Court, Room 5000, United States Courthouse, 701 E. Broad Street, Richmond, Virginia 23219.

[Notice continued on next page]

If you or your attorneys do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice or hearing.

Dated: April 30, 2009
Greenbelt, Maryland

McNAMEE HOSEA

By: /s/ Craig M. Palik
Craig M. Palik, Esq.
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*Co-counsel for CC Hamburg N.Y.
Partners, LLC, as successor-in-interest to
Hamburg Peripheral Limited Partnership*

CERTIFICATE OF SERVICE

I certify that the foregoing Notice of Motion of CC Hamburg N.Y. Partners, LLC for Entry of an Order Granting Allowance and Compelling Payment of Administrative Expense Claim and was served by first-class mail, postage prepaid on April 30, 2009 to those parties listed on the attached Service List, and to all creditors and parties included in the Court's ECF e-mail notification system.

Dated: April 30, 2009

By: /s/ Craig M. Palik
Craig M. Palik

SERVICE LIST

<p>Douglas M. Foley, Esq. McGuire Woods, LLP One James Center 901 East Cary St. Richmond, VA 23219</p> <p><i>Counsel for the Debtors</i></p>	<p>Greg M. Galardi, Esq. Ian S. Fredericks, Esq. Skadden, Arps, Slate, Meagher & Flom, LLP One Rodney Square P.O. Box 636 Wilmington, Delaware 19899-0636</p> <p><i>Counsel for the Debtors</i></p>
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<p>Lynn L. Tavenner, Esq. Paula S. Beran, Esq. Tavenner & Beran, P.C. 20 North Eights Street, 2nd Floor Richmond, Virginia 23219</p> <p><i>Counsel for the Official Committee of Unsecured Creditors</i></p>	<p>Jeffrey N. Poemrantz, Esq. Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Boulevard, 11th Floor Los Angeles, California 90067-4100</p> <p><i>Counsel for the Official Committee of Unsecured Creditors</i></p>
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